

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the

Northern District of California

SEAN O'TOOLE, KELLEY BARBARA O'TOOLE,
STEVEN DANIEL LEE,
JENNIFER LYNN CURTIS, and JACK FOSTER,

Plaintiff

v.

CITY OF ANTIOCH, ANTIOCH POLICE
DEPARTMENT, et. al

Defendant

Civil Action No. CV-11-01502 PJH

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: CITY OF ANTIOCH

(Name of person to whom this subpoena is directed)

☒ **Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

Place: LAW OFFICES OF TIM A. PORI
521 GEORGIA STREET,
VALLEJO, CA 94590

Date and Time: 6/18/14 @ 9:30 am

☐ **Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 05/16/2014

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

SEAN O'TOOLE,
KELLEY
BARBARA
O'TOOLE,
STEVEN
DANIEL LEE,
JENNIFER
LYNN CURTIS,
and JACK
FOSTER

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)*

_____, who issues or requests this subpoena, are:
TIM A. PORI, 521 GEORGIA STREET VALLEJO, CA 94590. (707)644-4004. TPori1@gmail.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

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Civil Action No. CV-11-01502 PJH

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____

on *(date)* _____

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

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Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) *For a Trial, Hearing, or Deposition.* A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) *For Other Discovery.* A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) *Command to Produce Materials or Permit Inspection.*

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) *Quashing or Modifying a Subpoena.*

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) *Claiming Privilege or Protection.*

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) *Contempt.*

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

1 **TIM A. PORI (SBN 189270)**
2 **JOHN BAUMGARDNER (SBN 275674)**
3 **LAW OFFICES OF TIM A. PORI**
4 **521 Georgia Street**
5 **Vallejo, CA 94590**
6 **Telephone: (707) 644-4004**
7 **Facsimile: (707) 644-7528**

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9
10 **Attorneys for Plaintiffs SEAN O'TOOLE,**
11 **KELLEY BARBARA O'TOOLE, STEVEN DANIEL LEE,**
12 **JENNIFER LYNN CURTIS, and JACK FOSTER**

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14
15 **IN THE UNITED STATES DISTRICT COURT**
16
17 **NORTHERN DISTRICT OF CALIFORNIA**

18 **SEAN O'TOOLE, KELLEY BARBARA**
19 **O'TOOLE, STEVEN DANIEL LEE,**
20 **JENNIFER LYNN CURTIS, and JACK**
21 **FOSTER,**

Case No. CV 11-01502 PJH

22 **PLAINTIFF'S FIRST REQUEST FOR**
23 **PRODUCTION OF DOCUMENTS TO**
24 **DEFENDANT CITY OF ANTIOCH**

25 **Plaintiffs,**

26 **vs.**

27 **CITY OF ANTIOCH, ANTIOCH POLICE**
28 **DEPARTMENT, JAMES HYDE CHIEF OF**
29 **ANTIOCH POLICE DEPARTMENT,**
30 **NORMAN WIELSCH, MICHAEL McGARY,**
31 **LOUIS LOMBARDI, JOSHUA**
32 **VINCELET, JAMES WISECARVER JR.,**
33 **STEVEN AIELLO, STEVEN**
34 **BERGERHOUSE, CHRISTOPHER**
35 **BUTLER, RONALD KRENZ, DANIELLE**
36 **JOANNIDES, STEPHANIE A. CHALK,**
37 **CAPTAIN LEONARD ORMAN, AND DOES**
38 **1 - 20, inclusive**

1 **REQUESTING PARTY** : Plaintiffs SEAN O'TOOLE,
 2 KELLEY BARBARA O'TOOLE, STEVEN
 3 **RESPONDING PARTY** : DANIEL LEE, JENNIFER LYNN CURTIS,
 4 and JACK FOSTER
 5 **REQUEST NUMBER** : Defendant CITY OF ANTIOCH
 6 **DATE OF PRODUCTION** : One
 7 **LOCATION FOR PRODUCTION:** June 18, 2014
 8 Law Offices of Tim A. Pori
 9 521 Georgia Street
 10 Vallejo, CA 94590

11 Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiffs SEAN O'TOOLE,
 12 KELLEY BARBARA O'TOOLE, STEVEN DANIEL LEE, JENNIFER LYNN CURTIS, and
 13 JACK FOSTER, by their undersigned counsel, request that defendant CITY OF ANTIOCH
 14 produce for inspection and copying at the offices of plaintiff's counsel the documents and things
 15 described below within 30 days of time of service of said requests in accordance with Rule 34 of
 16 the Federal Rules of Civil Procedure.

17 These requests are deemed to be continuing, and defendant has the duty to supplement
 18 their responses.

19 GENERAL INSTRUCTIONS

20 A. These requests applicable are directed to defendant CITY OF ANTIOCH who will
 21 hereinafter be referred to collectively as "you" or "your." The requests require you to do the
 22 following: (1) appear before the Law Offices of Tim A. Pori at the time and date set forth; (2)
 23 produce during deposition to the Plaintiffs all requested documents described in this deposition
 24 request that are in your possession, custody, or control or in the possession, custody, or control of
 25 any of attorneys, agents, representatives, financial advisors, accountants, consultants or police
 26 agencies; (3) identify and authenticate all documents produced; and (4) provide testimony
 27 concerning the activities and affairs of the documents.

28 B. You will be questioned regarding methods of compliance and as to whether all
 documents described in this request have been produced. All documents described in this order
 should be brought before the Law Offices of Tim A. Pori on the date set forth in this subpoena,
 including any documents with respect to which you claim any privilege. You may then and there
 assert the privilege before the Law Offices of Tim A. Pori and withhold the specific documents
 involved or you may waive your privilege and release the documents to the Law Offices of Tim
 A. Pori.

C. Each document subpoenaed pursuant to this request should be identified according to the
 numbered paragraph of the order to which it is responsive. In lieu of indicating on each
 document the paragraph to which it is responsive, you may provide an index of all documents
 you produce, as long as this index shows the appropriate paragraph to which each document or
 group of documents is responsive.

D. Documents produced must include the file folder tabs, containers, and labels appended to, or containing the documents. Any electronic mail, electronic document, electronic file, electronic data, electronic spreadsheet, or other electronic information such as digitized pictures and audio (for example, data stored in MPEG, JPEG, or GIF) must be provided in its native or original electronic format (i.e., any Outlook e-mail messages must be provided in its native Outlook .pst and/or server files). Any images provided must include linking files and instructions for loading images.

E. For any requested document that you claim to be protected by privilege or immunity, state as to each such document the privilege or immunity asserted and the following information:

1. The identity of the author(s);
2. The date the document was created;
3. The identity of the person(s) to whom it was addressed and to whom one or more copies were directed to be transmitted;
4. The identity of the person(s) to whom the document or a copy thereof was transmitted, directed, delivered, or provided;
5. The identity of the person(s) to whom you know has knowledge of, or reasonably believe has knowledge of, the contents of the document
6. A sufficient description of the document to identify its general subject matter without revealing information over which a privilege is claimed; and
7. The basis of the claim of privilege or immunity.

DEFINITIONS

F. The term "document" shall have the meaning set forth in Rule 34 of the Federal Rules of Civil Procedure and shall refer to any means by which information is recorded or retained, including without limitation, originals, non-identical copies, drafts, or electronic or computer data storage. As used herein, the term "document" means the original and all nonidentical copies (whether different from the original because of notes or underlining made thereon, attachments affixed thereto, annotations, marks, transmissions, highlighting of any kind, or otherwise) of any written, printed, graphic, electronically generated/retained recorded material or electronic data of writings of every kind and description, that are fixed in any form of physical media. Physical media include, but are not limited to, paper media, phonographic media, photographic film media (including pictures, prints, films, slides, microfiche, and microfilm), magnetic media of all types (including but not limited to hard disks, floppy disks, compact disks, and magnetic tapes of any kind), computer media in its native format, any other vehicle for digital data storage, and/or transmittal including digitized video, pictures, images and/or audio, voicemail, e-mail in its native form, and any other physical media on which notations or marking of any kind can be affixed.

G. Writings shall include, without limitation, all materials of any kind including, but not limited to emails, orders, instructions, directives, regulations, reports, interviews, statements,

1 summaries, complaints, transcripts, memoranda, notes, request envelopes, correspondence, logs,
 2 affidavits, warrants, lists of property seized, internal and external chain of custody document,
 3 electronic mail, post-its, messages, telephone messages, telephone logs, diaries, journals,
 4 appointment calendar, calendar, group scheduler calendar, drawings, paintings, images,
 5 accounting papers, minutes, working papers, financial reports, accounting reports, work papers,
 6 drafts, facsimile, facsimile transmissions, contracts, invoices, records of purchase or sale,
 spreadsheets, electronic spreadsheets, charts, graphs, indexes, transcripts, logs, directory,
 computer directory, computer disk, computer tape, or any other written, printed, typed, punched,
 taped, filmed, or graphic matter however produced or reproduced.

1. As used herein, the singular shall include the plural, and *vice versa*.
2. The plural of any term used herein includes the singular, and the singular includes the plural. The masculine gender of any term used herein includes the feminine and also includes "it" or "its." The past tense of any verb used herein includes the present tense, and the present tense includes the past tense.
3. As used herein, "or" shall include "and/or".
4. As used herein, the phrase "related to" means pertaining to, concerning, involving, mentioning, or discussing, in whole or in part, the subject matter of the request.
5. The term "Internal Affairs Bureau" shall include any department, division, board, committee or file in which police misconduct complaints are lodged, investigated and/or filed, and/or any department, division, board or committee which supervises and monitors the conduct of police officers.
6. If documents responsive to a particular request no longer exist, but are known to have been in existence, state the circumstances under which they were lost or destroyed, describe the documents to the fullest extent possible, state the request(s) to which they are responsive, and identify any persons having knowledge of the content of such documents.

REQUESTS FOR PRODUCTION

1. Any and all documents pertaining and related to the investigation or arrest or detention, search or seizure of Jennifer Lynn Curtis, DOB 7-26-80, and Kevin Darel Ackerman, DOB, 9-29-71, and their home at 701 Thompsons Dr., Brentwood, Ca., 94513, which began on or around or between 6/28/07 through 12/31/09, including Antioch Police Department investigation or arrest reports, recordings, e-mails, affidavits for search warrants, search warrants, applications for destruction orders, destruction orders, returns to search warrants, lists of property and/or currency seized, internal and external evidence chain of custody documents, asset forfeiture documents, CAD logs, photographs, video, and audio recordings, and recorded radio communications, and internal and external evidence chain of custody documents of property seized, by Antioch PD, and or CCCNET (Contra Costa County Narcotics Enforcement Team), and the California Highway Patrol, as well as including reports constituting, referring and related to Norm Wielsch, Louis Lombardi, Chris Butler, Michael McGary, Joshua Vincelet, Steven

Bergerhouse, Ronald Krenz, Danielle Joannides, Stephanie Chalk, Leonard Orman, Michael Mortimer, Steven Aiello, James Wisecarver Jr., or any other state, local, or Federal Investigation agent or officer involved in the Thompsons Dr. raid pursuant to Martinez, Ca., Sup. Ct. Search Warrant case #M07-269, including reports drafted by Chris Butler as an expert in steroids, or any and all reports drafted by any member of the Antioch Police Department, or CHP.

2. Any and all reports, recordings, e-mails, photographs, video and audio recordings, or memos drafted pertaining to the above-mentioned 701 Thompsons Dr., Brentwood, CA raid by any above-entitled Law enforcement agency including Antioch Police Department, APD Internal Affairs Bureau investigation reports, investigation reports by the Contra Costa County District Attorney's Office, Bureau of Narcotics Enforcement reports, or reports by any special agent of the Federal Bureau of Investigation regarding any independent investigation of the raid which occurred beginning on or about or between 6/28/07 through 12/31/09.

3. Any and all documents pertaining and related to the investigation or arrest or any detentions, consensual encounters, search or seizure of Jennifer Lynn Curtis, DOB 7-26-80, and Kevin Darel Ackerman, DOB, 9-29-71, and search and seizure of their home at 701 Thompsons Dr., Brentwood, Ca., 94513, which began on or about or between 6/28/07 through 12/31/09 including investigation or arrest reports, recordings, e mails, photographs, video and audio recordings, affidavits for search warrants, search warrants, applications for destruction orders, destruction orders, returns to search warrants, lists of property and currency seized, asset forfeiture documents, CAD logs, photographs, and recorded radio communications, and internal and external evidence chain of custody documents of property seized, by Antioch PD, CCCNET, pursuant to Search Warrant, case #P08-301, (CCCNET case number TF07-00076), including reports constituting referring and related to Norm Wielsch, Louis Lombardi, Chris Butler, Michael McGary, Joshua Vincelet, Steven Bergerhouse, Ronald Krenz, Danielle Joannides, Stephanie Chalk, Leonard Orman, Michael Mortimer, Steven Aiello, James Wisecarver Jr., or any other state, local, or Federal Investigation agent or officer involved in the above-mentioned Thompsons Dr. raid.

4. Any and all reports, audio and video recordings, e mails, photographs, video, or memos drafted pertaining to the above mentioned raid at 701 Thompsons Dr., Brentwood, CA, by any above-entitled Law enforcement agency including Antioch PD Internal Affairs Bureau investigation reports, investigation reports by the Contra Costa County District Attorney's Office, Bureau of Narcotics Enforcement reports, or reports by any special agent of the Federal Bureau of Investigation regarding independent investigation of the raid beginning on or about or between 6/28/07 through 12/31/09.

5. Any and all reports, audio and video recordings, e mails, photographs, or memos drafted pertaining to the above-mentioned raid at 701 Thompsons Dr., Brentwood, CA, by any above-entitled Law enforcement agency including APD Internal Affairs Bureau investigation reports, investigation reports by the Contra Costa County District Attorney's

Office, Bureau of Narcotics Enforcement reports, or reports by any special agent of the Federal Bureau of Investigation regarding independent investigation of the above-named Thompsons Dr. raid beginning on or around or between 6/28/07 through 12/31/09.

6. Any and all documents pertaining to any CCCNET and/or Antioch PD raid on 701 Thompsons Dr., Brentwood, Ca., 94513, beginning on or around or between 6/28/07 through 12/31/09, including investigation or arrest reports, audio and video recordings, e mails, applications for search warrants, search warrants, returns to search warrants, lists of property and currency seized, application for destruction orders, destruction orders, asset forfeiture documents, CAD logs, and recorded radio communications pertaining and related to any detentions, consensual encounters, and internal and external evidence chain of custody documents of property searched and seized from Jennifer Lynn Curtis, DOB 7-26-80, and Kevin Darel Ackerman, DOB, 9-29-71 and their home at 701 Thompsons Dr., Brentwood, Ca., 94513, including reports constituting, referring and related to Norm Wielsch, Louis Lombardi, Chris Butler, Michael McGary, Joshua Vincelet, Steven Bergerhouse, Ronald Krenz, Danielle Joannides, Stephanie Chalk, Leonard Orman, Michael Mortimer, Steven Aiello, James Wisecarver Jr., or any other state local, or Federal Investigation agent or officer involved in the raid beginning on or around or between 6/28/07 through 12/31/09.

7. Any and all reports, recordings, e-mails, photographs, audio and video recordings, or memos drafted pertaining to the raid at 701 Thompsons Dr., Brentwood, CA, which began on or around or between 6/28/07 through 12/31/09, by any law enforcement agency including APD Internal Affairs Bureau investigation reports, investigation reports by the Contra Costa County District Attorney's Office, San Ramon PD, Bureau of Narcotics Enforcement reports, or reports by any special agent of the Federal Bureau of Investigation regarding independent investigation of the raid on 701 Thompsons Dr., Brentwood, Ca., 94513, beginning on or around or between 6/28/07 through 12/31/09.

8. Any and all documents memorializing any and all verbal or written complaints by Ms. Jennifer Curtis about the seizure of a wrist watch, currency, or any other property from her home on 701 Thompsons Dr., Brentwood CA, made to the Antioch PD, Brentwood PD, San Ramon PD, or CCCNET beginning on or around or between 6/28/07 through 12/31/09, including reports, e mails, audio and video recordings, CAD logs, any memoranda or phone logs or front counter logs memorializing contacts about complaints between Jennifer Lynn Curtis and Antioch PD, San Ramon PD, or CCCNET including, photographs, and radio communications.

9. Any documents pertaining to Ms. Curtis's complaints of any law enforcement raid on her home at 701 Thompsons Dr., Brentwood CA, beginning on or around or between 6/28/07 through 12/31/09, including investigation reports, or arrest reports of any suspect related to the theft of the watch, audio or video recordings, e-mails, affidavits for search warrants, search warrants, returns to search warrants, lists of property and currency seized, asset forfeiture documents, CAD logs, and recorded radio communications.

10. Any and all documents pertaining to any verbal or written complaints by Ms. Jennifer

1 Curtis to the Antioch PD, or San Ramon PD regarding Ms. Curtis's complaint of the
 2 search of her home and the seizure of a wrist watch, currency, or any other property from
 3 her home at 701 Thompsons Dr., Brentwood CA, beginning on or around or between
 4 6/28/07 through 12/31/09, including informational reports, audio and video recordings, e
 5 mails, photographs, or memos drafted by any law enforcement agency in the possession
 6 of APD including APD Internal Affairs Bureau investigation reports, investigation reports
 by the Contra Costa County District Attorney's Office, San Ramon PD, Bureau of
 Narcotics Enforcement reports, or reports by any special agent of the Federal Bureau of
 Investigation.

11. Any and all documents constituting referring and related to the visit to the San Ramon
 Police Department by Jennifer Curtis beginning on a date unknown or on or about May
 25, 2011 to identify any wrist watch in the possession of APD referring to any report by
 San Ramon PD including reports drafted by SRPD officers Gary Goldberg #32, or Jason
 Barnes #23 or any other member or agent of San Ramon PD.

12. Any other documents regarding any investigation into the seizure of any wrist watch
 from Ms. Curtis, beginning 6/28/07 through 12/31/09, constituting, referring, and related
 to Norm Wielsch, Louis Lombardi, Chris Butler, Michael McGary, Joshua Vincelet,
 Steven Bergerhouse, Ronald Krenz, Danielle Joannides, Stephanie Chalk, Leonard
 Orman, Michael Mortimer, Steven Aiello, James Wisecarver Jr., or any other state, local,
 or Federal Investigation agent or officer investigating or interviewing any Antioch PD
 agent or officer pertaining to Ms. Curtis' complaint about a wrist watch, including reports
 generated by any state, federal or local agent, including investigation or arrest reports,
 recordings, e-mails, photographs, audio and video recordings, search warrants, returns to
 search warrants, lists of property and currency seized, asset forfeiture documents, CAD
 logs, recorded radio communications, and internal and external evidence chain of custody
 documents seized.

13. Any and all documents including investigation or arrest reports, recordings, e-mails,
 photographs, video, search warrants, returns to search warrants, lists of property and
 currency stolen, asset, CAD logs, photographs, and recorded radio communications
 pertaining and related to the burglary of the home of Detective Michael Mortimer
 beginning on a date unknown or on or about 2011.

14. Any and all documents in the possession of APD pertaining and related to any
 detentions, consensual encounters, or search of the home of and seizure any property
 where a large amount of currency was taken from the home of James E. Cooper, DOB,
 12-07-69, located on 233 Gleason Ave, Vallejo CA 94590 and any other residences he is
 associated with including but not limited to his wife's residence beginning on a date
 unknown or on or about or between 12/01/07 to 12/31/08, (see CCCSO case report
 #07-31103) including investigation or arrest reports, recordings, e-mails, photographs,
 video, affidavits in support of search warrants, search warrants, returns to search
 warrants, application for destruction orders, destruction orders, lists of property and
 currency seized, asset forfeiture documents, and internal and external evidence chain of

1 custody documents of property seized, drafted by any law enforcement agency in the
2 possession of APD, including Internal Affairs Bureau investigation reports, investigation
3 reports by the Contra Costa County District Attorney's Office, Bureau of Narcotics
4 Enforcement reports, or reports by any special agent of the Federal Bureau of
5 Investigation, as well as CAD logs, and recorded radio communications.

6 15. Any and all documents pertaining and related to any detentions, consensual encounters,
7 or search and seizure of Justin Reis, at 409 Elberta Ct., Brentwood, Ca., 94513 and his
8 home beginning on a date unknown or May 2008, including investigation or arrest
9 reports, recordings, e mails, photographs, video, affidavits for search warrants, search
10 warrants, returns to search warrants, lists of property and currency seized, application for
11 destruction orders, destruction orders, asset forfeiture documents, and internal and
12 external evidence chain of custody documents of property seized, drafted by any law
13 enforcement agency in the possession of APD, including Internal Affairs Bureau
14 investigation reports, investigation reports by the Contra Costa County District Attorney's
15 Office, Bureau of Narcotics Enforcement reports, or reports by any special agent of the
16 Federal Bureau of Investigation, as well as CAD logs, and recorded radio
17 communications.

18 16. Any and all documents pertaining and related to any detentions, consensual encounters, or
19 search and seizure of Charles "Chucky" Michael Ortega DOB, 1-23-86, and Angelita
20 Baldazo-Ortega, DOB, 10-17-88 at 2201 Sycamore Dr. #16, Antioch, Ca., 94509 and
21 their home beginning on or around 1/14/10 (See Search Warrant #M10-023) including
22 investigation or arrest reports, , as well as CAD logs, recorded radio communications,
23 recordings, e mails, photographs, video, search warrants, returns to search warrants, lists
24 of property and currency seized, application for destruction orders, destruction orders, and
25 internal and external evidence chain of custody documents of property seized, asset
26 forfeiture documents, (see CCSC #N10-0307) drafted by any law enforcement agency in
27 the possession of APD, including Internal Affairs Bureau investigation reports,
28 investigation reports by the Contra Costa County District Attorney's Office, Bureau of
Narcotics Enforcement reports, or reports by any special agent of the Federal Bureau of
Investigation.

17. Any and all documents pertaining and related to any detentions, consensual encounters, or
search and seizure of Paul R. Quintana beginning on a date unknown or on or around
1/14/10, including investigation or arrest reports, recordings, e mails, photographs,
video, search warrants, returns to search warrants, lists of property and currency seized,
application for destruction orders ,destruction orders, asset forfeiture documents, and
internal and external evidence chain of custody documents of property seized drafted by
any law enforcement agency in the possession of APD, including Internal Affairs Bureau
investigation reports, investigation reports by the Contra Costa County District Attorney's
Office, Bureau of Narcotics Enforcement reports, or reports by any special agent of the
Federal Bureau of Investigation, as well as CAD logs, and recorded radio
communications

- 1 18. Any and all documents pertaining and related to any detentions, consensual encounters, or
2 search and seizure of Sergio Ortega Jr, and Renee Beth Earle's home at 286 Pebble Beach
3 Dr., Brentwood, CA and their home beginning on a date unknown or on or about or
4 between 1/1/08 through 12/31/08, including CAD logs, and recorded radio
5 communications, investigation or arrest reports, recordings, e mails, photographs, video,
6 search warrants, returns to search warrants, lists of property and currency seized,
7 application for destruction orders, destruction orders, asset forfeiture documents, and
8 internal and external evidence chain of custody documents of property seized, drafted by
9 Antioch Police Department, or any law enforcement agency in the possession of APD,
10 including Internal Affairs Bureau investigation reports, investigation reports by the
11 Contra Costa County District Attorney's Office, Bureau of Narcotics Enforcement
12 reports, or reports by any special agent of the Federal Bureau of Investigation, Federal
13 Drug Enforcement Administration
- 14 19. Any and all documents pertaining and related to any detentions, consensual encounters,
15 or search and seizure of either Michelle Iniguez and/or Gabriel Iniguez, and their home
16 on 57 Chelsea Wy, Pittsburg, CA beginning on a date unknown or on or about or between
17 1/1/08 through 12/31/08, including CAD logs, and recorded radio communications,
18 investigation or arrest reports, recordings, e-mails, photographs, video, search warrants,
19 returns to search warrants, lists of property and currency seized, application for
20 destruction order, destruction orders, asset forfeiture documents, and internal and external
21 evidence chain of custody documents seized, drafted by Antioch Police Department, or
22 any law enforcement agency in the possession of APD, including Internal Affairs Bureau
23 investigation reports, investigation reports by the Contra Costa County District Attorney's
24 Office, Bureau of Narcotics Enforcement reports, or reports by any special agent of the
25 Federal Bureau of Investigation, Federal Drug Enforcement Administration
- 26 20. Any and all documents pertaining and related to any detentions, consensual encounters, or
27 search and seizure of Sergio Ortega Jr, and Renee Beth Earle, their home on 286 Pebble
28 Beach Dr., Brentwood, CA and the Broken Wheel Cocktail Lounge, 5620 Main Street,
Oakley, CA , beginning on or about or between 1/1/08 through 12/31/08, including
investigation or arrest reports, recordings, e mails, photographs, video, search warrants,
returns to search warrants, lists of property and currency seized, application for
destruction orders, destruction orders, asset forfeiture documents, internal and external
evidence chain of custody documents of property seized, drafted by Antioch Police
Department, or any law enforcement agency in the possession of APD, including Internal
Affairs Bureau investigation reports, investigation reports by the Contra Costa County
District Attorney's Office, Bureau of Narcotics Enforcement reports, or reports by any
special agent of the Federal Bureau of Investigation, Federal Drug Enforcement
Administration, as well as CAD logs, and recorded radio communications
- 21 21. Any and all documents pertaining and related to any detentions, consensual encounters, or
22 search and seizure of Lewis "Randy" Decker, DOB, 3-15-54, beginning on a date
23 unknown or on or about or between 3/1/10 and 7/1/10 including CAD logs, and recorded

1 radio communications, investigation or arrest reports, recordings, e mails, photographs,
2 video, search warrants, returns to search warrants, lists of property and currency seized,
3 application for destruction orders, destruction orders, asset forfeiture documents, and
4 internal and external evidence chain of custody documents seized, drafted by Antioch
5 Police Department, or any law enforcement agency in the possession of APD, including
6 Internal Affairs Bureau investigation reports, investigation reports by the Contra Costa
County District Attorney's Office, Bureau of Narcotics Enforcement reports, or reports by
any special agent of the Federal Bureau of Investigation, Federal Drug Enforcement
Administration.

22. Any and all documents pertaining and related to any detentions, consensual encounters, or
7 search and seizure of the home of Michael B. Stout (aka - "Tahoe Mike"), DOB, 5-9-80,
8 at 3828 Killdeer Dr., Antioch, Ca. beginning on a date on or about or between 5/1/06
9 through 1/1/09, see CCC Superior Court search warrant #P07-220 signed by the court on
10 August 9, 2007, including CAD logs, and recorded radio communications, investigation
11 or arrest reports, recordings, e mails, photographs, video, search warrants, returns to
12 search warrants, lists of property and currency seized, application for destruction orders,
13 destruction orders, asset forfeiture documents, and internal and external evidence chain of
14 custody documents of property seized, drafted by Antioch Police Department, or any law
enforcement agency in the possession of APD, including Internal Affairs Bureau
investigation reports, investigation reports by the Contra Costa County District Attorney's
Office, Bureau of Narcotics Enforcement reports, or reports by any special agent of the
Federal Bureau of Investigation, or Federal Drug Enforcement Administration.

23. Any and all documents pertaining to consensual encounters, arrests, or search and
15 seizures of Anthony Denner, DOB 5/6/79, or search and seizure of the business known as
16 the "Fashion Statement" 401 Sunset Drive Ste. 401 E, Antioch, Ca. owned and/or
17 operated by Anthony Denner, beginning on a date unknown or on or about or between
18 1/1/09 through 12/31/13, including CAD logs, and recorded radio communications,
19 investigation or arrest reports, recordings, e mails, photographs, video, search warrants,
20 returns to search warrants, lists of property and currency seized, application for
21 destruction order, destruction orders, asset forfeiture documents, and internal and external
22 evidence chain of custody documents of property seized, drafted by Antioch Police
Department, or any law enforcement agency in the possession of the Antioch PD,
including Internal Affairs Bureau investigation reports, investigation reports by the
Contra Costa County District Attorney's Office, Bureau of Narcotics Enforcement
reports, or reports by any special agent of the Federal Bureau of Investigation, or Federal
Drug Enforcement Administration.

24. Any and all documents or search and seizure of the home of Anthony Denner, DOB
23 5/6/79 by any officer or agent of APD, beginning on a date unknown or on or about or
24 between 1/1/09 and 12/31/13, including CAD logs, and recorded radio communications,
25 investigation or arrest reports, recordings, e mails, photographs, video, search warrants,
26 returns to search warrants, lists of property and currency seized, application for

1 destruction order, destruction orders, asset forfeiture documents, and internal and external
2 chain of custody documents of property seized, drafted by Antioch Police Department, or
3 any law enforcement agency in the possession of APD, including Internal Affairs Bureau
4 investigation reports, investigation reports by the Contra Costa County District Attorney's
5 Office, Bureau of Narcotics Enforcement reports, or reports by any special agent of the
6 Federal Bureau of Investigation, Federal Drug Enforcement Administration.

7 25. Any and all documents pertaining and related to any detentions, consensual encounters, or
8 search and seizure Sean Adolfo O'Toole, DOB 12/21/74 and Kelly Barbara O'Toole,
9 DOB 1/13/75, their business Known as the "Grow it Yourself" located on 401 Sunset
10 Drive Ste. 401 F, Antioch, Ca., and any "Grow it Yourself" employees, beginning on or
11 about 10/14/09 including CAD logs, and recorded radio communications, investigation or
12 arrest reports, computer analysis of computers authored by Officer Stanton or any other
13 individual examining any computers seized from Grow it Yourself, recordings, e mails,
14 copies of computer hard drives seized, photographs, video, search warrants, returns to
15 search warrants, lists of property and currency seized, application for destruction orders
16 ,destruction orders, asset forfeiture documents, and internal and external chain of custody
17 documents of property seized, drafted by Antioch Police Department, or any law
18 enforcement agency in the possession of APD, including Internal Affairs Bureau
19 investigation reports, investigation reports by the Contra Costa County District Attorney's
20 Office, Bureau of Narcotics Enforcement reports, or reports by any special agent of the
21 Federal Bureau of Investigation, and Federal Drug Enforcement Administration.

22 26. Any and all documents pertaining to the search and seizure of Steven Daniel Lee's
23 property and his arrest at 401 Sunset Drive Ste. F, Antioch, Ca. beginning on a date
24 unknown or on or about or between 10/14/09, including CAD logs, and recorded radio
25 communications, investigation or arrest reports, recordings, e mails, photographs, video,
26 search warrants, returns to search warrants, application for destruction order, destruction
27 orders, lists of property and currency seized, asset forfeiture documents, and internal and
28 external evidence chain of custody documents of property seized, documents pertaining to
charging decisions of Mr. Lee drafted by Antioch Police Department, or any law
enforcement agency in the possession of APD, including Internal Affairs Bureau
investigation reports, investigation reports or charging decision documents by the Contra
Costa County District Attorney's Office, Bureau of Narcotics Enforcement reports, or
reports by any special agent of the Federal Bureau of Investigation, and Federal Drug
Enforcement Administration.

29 27. Any and all documents pertaining and related to any detentions, consensual encounters,
30 and search and seizure of Daniel Leal at 401 Sunset Drive Ste. F, Antioch, Ca. beginning
31 on a date unknown or on or about or between 10/14/09 including CAD logs, and recorded
32 radio communications, investigation or arrest reports, recordings, e mails, photographs,
33 video, search warrants, returns to search warrants, lists of property and currency seized,
34 application for destruction orders, destruction orders, asset forfeiture documents, and
35 internal and external evidence chain of custody documents of property seized, drafted by

1 Antioch Police Department, or any law enforcement agency in the possession of APD,
 2 including Internal Affairs Bureau investigation reports, investigation reports by the
 3 Contra Costa County District Attorney's Office, Bureau of Narcotics Enforcement
 4 reports, or reports by any special agent of the Federal Bureau of Investigation, Federal
 5 Drug Enforcement Administration.

6 28. Any and all documents pertaining and related to any detentions, consensual encounters,
 7 and search and seizure of Jack Foster at 4162 Tulare Ct., Antioch, Ca. beginning on a
 8 date unknown or on or about 1/5/10 including CAD logs, and recorded radio
 9 communications, investigation or arrest reports, recordings, e-mails, photographs, video,
 10 search warrants, returns to search warrants, lists of property and currency seized,
 11 application for destruction order, destruction orders, asset forfeiture documents, internal
 12 and external evidence chain of custody documents of property seized, and charging
 13 decision documents, drafted by the Antioch Police Department, or any law enforcement
 14 agency in the possession of APD, including Internal Affairs Bureau investigation reports,
 15 investigation reports or charging decision documents, by the Contra Costa County District
 16 Attorney's Office, Bureau of Narcotics Enforcement reports, or reports by any special
 17 agent of the Federal Bureau of Investigation, Federal Drug Enforcement Administration.

18 29. Any and all documents constituting referring, and related to any detentions, consensual
 19 encounters, or search and seizure of Ralph Junior Howard, DOB, 12-5-41,
 20 at 2924 Pear St., Antioch, Ca., 94509, Mark A. Fernandez, DOB, 5-19-57, at 2924
 21 Pear St., Antioch, Ca., Stephanie Lynn Rangel DOB, 4-12-69, at 2924 Pear St.,
 22 Antioch, Ca., 94509, and Deborah L. Tierney, DOB, 4-22-53, at 2924 Pear St.,
 23 Antioch, Ca., 94509 or the search of the residence on 2924 Pear street Antioch, CA
 24 beginning on a date unknown or on or about or between 1/1/10 through 12/31/10,
 25 including CAD logs, and recorded radio communications, investigation or arrest reports,
 26 recordings, e mails, photographs, video, search warrants, returns to search warrants, lists
 27 of property and currency seized, application for destruction order, destruction orders,
 28 asset forfeiture documents, and internal and external evidence chain of custody
 documents of property seized, drafted by Antioch Police Department, or any law
 enforcement agency in the possession of APD, including Internal Affairs Bureau
 investigation reports, investigation reports or charging decision documents, by the Contra
 Costa County District Attorney's Office, Bureau of Narcotics Enforcement reports, or
 reports by any special agent of the Federal Bureau of Investigation, or Federal Drug
 Enforcement Administration.

30. Any and all documents constituting, referring, and related to or any and all Antioch Police
 Department responses, involvement, notification and communications regarding
 2924 Pear St., Antioch, Ca., for any reason beginning on a date unknown or on or about
 or between 1/1/05 through 12/31/13, including arrests, any detentions, consensual
 encounters, CAD logs, and recorded radio communications, investigation or arrest
 reports, recordings, e mails, photographs, video, search warrants, returns to search
 warrants, application for destruction orders, destruction orders, lists of property and

currency seized, asset forfeiture documents, and internal and external evidence chain of custody documents of property seized, drafted by Antioch Police Department, or any law enforcement agency, including Internal Affairs Bureau investigation reports, investigation reports or charging decision documents, by the Contra Costa County District Attorney's Office, Bureau of Narcotics Enforcement reports, or reports by any special agent of the Federal Bureau of Investigation, or Federal Drug Enforcement Administration.

31. Any and all documents pertaining to any detentions, consensual encounters, arrest, search or seizure of Art K. Carasis, DOB 12-17-54, and his home, at 1400 Noia Ave., Antioch, Ca., 94509 beginning on a date unknown or on or about or between 1/1/05 through 12/31/13, including CAD logs, and recorded radio communications, investigation or arrest reports, recordings, e mails, photographs, video, search warrants, returns to search warrants, lists of property and currency seized, application for destruction order, destruction orders, asset forfeiture documents, and internal and external evidence chain of custody documents of property seized, drafted by Antioch Police Department, or any law enforcement agency in the possession of APD, including Internal Affairs Bureau investigation reports, investigation reports or charging decision documents by the Contra Costa County District Attorney's Office, Bureau of Narcotics Enforcement reports, or reports by any special agent of the Federal Bureau of Investigation, and Federal Drug Enforcement Administration.

32. Any and all documents pertaining any detentions, consensual encounters, arrest, search or seizure of Abraham Jesus Hurtado, DOB, 7-14-86, of and/or 95219, Kathy Montoya, DOB, 10-17-88, at 2212 Banyon Way, Antioch, CA. on or about or between 1/1/10 through 12/31/10, including CAD logs, and recorded radio communications, investigation or arrest reports, recordings, e mails, photographs, video, search warrants, returns to search warrants, lists of property and currency seized, application for destruction orders, destruction orders, asset forfeiture documents (see case number CCC Superior Court #No. 10-0044), and internal and external evidence chain of custody documents of property seized, drafted by the Antioch Police Department, or any law enforcement agency in the possession of APD, including Internal Affairs Bureau investigation reports, investigation reports or charging decision documents by the Contra Costa County District Attorney's Office, Bureau of Narcotics Enforcement reports, or reports by any special agent of the Federal Bureau of Investigation, and Federal Drug Enforcement Administration.

33. Any and all documents pertaining to any detentions, consensual encounters, arrest, search or seizure of Timothy Scott Murray DOB 11-7-73, or the search and seizure of items from his home at 801 Gatter Ct. Antioch, CA beginning on a date unknown or on or about or between 1/1/06 through 12/31/06, including CAD logs, and recorded radio communications, investigation or arrest reports, recordings, e mails, photographs, video, search warrants, returns to search warrants, lists of property and currency seized, application for destruction order, destruction orders, asset forfeiture documents, and internal and external evidence chain of custody documents of property seized, drafted by Antioch Police Department, or any law enforcement agency in the possession of APD,

including Internal Affairs Bureau investigation reports, investigation reports by the Contra Costa County District Attorney's Office, Bureau of Narcotics Enforcement reports, or reports by any special agent of the Federal Bureau of Investigation, Federal Drug Enforcement Administration.

34. Any and all documents pertaining to any detentions, consensual encounters, arrest, search or seizure Jennifer Marie Anderson, DOB, 4-5-89, or of the search and seizure of items from her home at 3550 Vancouver Way, Concord, Ca., 94520, beginning on a date unknown or on or about or between 1/1/09 through 12/31/09 including CAD logs, and recorded radio communications, investigation or arrest reports, recordings, e mails, photographs, video, search warrants, returns to search warrants, lists of property and currency seized, application for destruction orders and destruction orders, asset forfeiture documents, and internal and external evidence chain of custody documents of property seized, drafted by Antioch Police Department, or any law enforcement agency in the possession of APD, including Internal Affairs Bureau investigation reports, investigation reports by the Contra Costa County District Attorney's Office, Bureau of Narcotics Enforcement reports, or reports by any special agent of the Federal Bureau of Investigation, or Federal Drug Enforcement Administration.

35. Any and all documents pertaining any detentions, consensual encounters, arrest, search or seizure, of Dominic Rodriguez DOB, 6-30-76, or of the search and seizure of items from either 4612 Oak Meadow Ct., Antioch, CA., and 5154 Fern Ridge Circle 3550, Discovery Bay, beginning on a date unknown or on or about or between 1/1/09 through 12/31/10, drafted by any officer or agent of the Antioch Police Department, including, CAD logs, and recorded radio communications, investigation or arrest reports, recordings, e mails, photographs, video, search warrants, returns to search warrants, lists of property and currency seized, application for destruction order, destruction orders, asset forfeiture documents, (See CCCSC case #N09-2028 and APD case #2009-011625), and internal and external evidence chain of custody documents or any law enforcement agency, including Internal Affairs Bureau investigation reports, investigation reports and charging decision documents by the Contra Costa County District Attorney's Office, Bureau of Narcotics Enforcement reports, or reports by any special agent of the Federal Bureau of Investigation, or Federal Drug Enforcement Administration.

36. Any and all documents drafted by any officer or agent of the Antioch Police Department, or any law enforcement agency, pertaining to any person charged in Contra Costa County Superior Court # 04-139481-6 including APD investigation or arrest reports, recordings, e mails, photographs, video, audio recordings, search warrants, returns to search warrants, lists of property and currency seized, application for destruction orders and destruction orders, asset forfeiture documents, as well as CAD logs, and recorded radio communications, and internal and external evidence chain of custody documents of property seized, pertaining the detention, arrest, and search or seizure documents, Internal Affairs Bureau investigation reports, investigation reports by the Contra Costa County District Attorney's Office, Bureau of Narcotics Enforcement reports, or reports by any special agent of the Federal Bureau of Investigation, and Federal Drug Enforcement

Administration.

37. Any and all documents pertaining to any detentions, consensual encounters, arrest, and search or seizure documents pertaining to any and all contacts between the Antioch Police Department and Angelo G. Vassos, DOB, 4-2-60, beginning on a date unknown or on or about or between 1/1/05 through 12/31/13 drafted by any officer or agent of the Antioch Police Department, or any law enforcement agency, including CAD logs, and recorded radio communications, investigation or arrest reports, recordings, e mails, photographs, video, audio recordings, search warrants, returns to search warrants, lists of property and currency seized, application for destruction orders and destruction orders, internal and external evidence chain of custody documents, asset forfeiture documents, Internal Affairs Bureau investigation reports, investigation reports or charging decision documents by the Contra Costa County District Attorney's Office, Bureau of Narcotics Enforcement reports, or reports by any special agent of the Federal Bureau of Investigation, or Federal Drug Enforcement Administration.

38. Any and all documents referencing Jack Foster, Sean O'Toole, Kelly O'Toole, Steven Daniel Lee, and Jennifer Lynn Curtis, drafted by the Antioch Police Department, including investigation or arrest reports, e mails, photographs, video, audio recordings, search warrants, returns to search warrants, lists of property and currency seized, internal and external evidence chain of custody documents, application for destruction orders, destruction orders, or any law enforcement agency in the possession of the Antioch Police Department, including Internal Affairs Bureau investigation reports, investigation reports or charging decision documents by the Contra Costa County District Attorney's Office, Bureau of Narcotics Enforcement reports, or reports by any special agent of the Federal Bureau of Investigation, or Federal Drug Enforcement Administration.

39. Any and all documents pertaining and related to any investigation constituting, referring and related to Norm Wielsch, Louis Lombardi, Chris Butler, Michael McGary, Joshua Vincelet, Steven Bergerhouse, Ronald Krenz, Danielle Joannides, Stephanie Chalk, Leonard Orman, Michael Mortimer, Steven Aiello, James Wisecarver Jr., Desmond Bittner, Matthew Koch, including CAD logs, photographs, video, audio interviews, wiretaps, recorded radio communications, arrest reports, investigation or informational reports, search warrants, returns to search warrants, lists of property and currency seized, application for destruction orders, destruction orders, internal and external chain of custody documents, asset forfeiture documents, including Internal Affairs Bureau investigation reports, investigation reports by the Contra Costa County District Attorney's Office, Bureau of Narcotics Enforcement reports, or reports by any special agent of the Federal Bureau of Investigation, or Federal Drug Enforcement Administration or any other state, local, or Federal Investigation agent or officer involved as either a suspect, witness, or investigator in any investigation of any drug or prostitution investigation involving the above-named officers, not referenced above, in which any above-named officer participated in, from 1/1/04 through 12/31/12.

40. The entire Antioch Police Department internal investigation file into the plaintiff's government tort claim related to the incidents alleged in plaintiff's Complaint, including, but not limited to, all memoranda, notes, writings, E-mail, audio and video recordings,

photographs, charts, diagrams, transcripts and physical evidence relating to any entry and search at either Plaintiffs' place of business known as Grow it Yourself Gardens LLC located at 401-F Sunset Drive Antioch, CA 94509, search of "Fashion Statement" 401 Sunset Drive Ste. 401 E, Antioch, Ca., search of 701 Thompsons Dr., Brentwood, Ca., 94513, including complaints by Ms. Jennifer Curtis about the seizure of a wrist watch, currency, or any other property from her home, made to the Antioch PD, Brentwood PD, San Ramon PD, or CCCNET beginning on a date no later than and/or on or about and between 6/1/07 through 12/31/09, search and seizure of 4162 Tulare Ct., Antioch, Ca., and Sean Adolfo O'Toole, and Kelly Barbara O'Toole, Jennifer Curtis, Jack Foster, or Steven Lee, beginning on a date no later than and/or on or about and between 1/1/10 through 12/31/10

41. Any and all documents pertaining and related to any detentions, arrests, marijuana investigations, and consensual encounters of Jerry Fairley, or search and seizure of any of his homes in Brentwood, Ca., or any home rented and or inhabited by Jerry Fairley in any city, beginning on a date unknown or on or about or between 1/1/09 through 12/31/10 including CAD logs, and recorded radio communications investigation or arrest reports, recordings, e mails, photographs, video, search warrants, returns to search warrants, lists of property and currency seized, application for destruction orders, destruction orders, internal and external chain of custody documents, asset forfeiture documents, drafted by Antioch Police Department, or any law enforcement agency in APD possession, including Internal Affairs Bureau investigation reports, investigation reports and documents pertaining to charging decisions, by the Contra Costa County District Attorney's Office, Bureau of Narcotics Enforcement reports, or reports by any special agent of the Federal Bureau of Investigation, and Federal Drug Enforcement Administration.

42. Any and all documents pertaining and related to any detentions, arrests, marijuana investigations, and consensual encounters of Angela Butler, DOB 7-5-74, beginning on a date unknown including CAD logs, and recorded radio communications investigation or arrest reports, recordings, e mails, photographs, video, search warrants, returns to search warrants, lists of property and currency seized, application for destruction orders, destruction orders, internal and external chain of custody documents, asset forfeiture documents, drafted by Antioch Police Department, or any law enforcement agency in APD possession, including Internal Affairs Bureau investigation reports, investigation reports and documents pertaining to charging decisions, by the Contra Costa County District Attorney's Office, Bureau of Narcotics Enforcement reports, or reports by any special agent of the Federal Bureau of Investigation, and Federal Drug Enforcement Administration.

43. Any and all documents pertaining and related to any detentions, arrests, marijuana investigations, and consensual encounters of Rhonda Lynn Dunning on a date unknown including CAD logs, and recorded radio communications investigation or arrest reports, recordings, e mails, photographs, video, search warrants, returns to search warrants, lists of property and currency seized, application for destruction orders, destruction orders, internal and external chain of custody documents, asset forfeiture documents, drafted by Antioch Police Department, or any law enforcement agency in APD possession, including

Internal Affairs Bureau investigation reports, investigation reports and documents pertaining to charging decisions, by the Contra Costa County District Attorney's Office, Bureau of Narcotics Enforcement reports, or reports by any special agent of the Federal Bureau of Investigation, and Federal Drug Enforcement Administration.

44. Any and all documents constituting, referring, and related to any detention, arrest, search or seizure Shiloh J. O'Neill, DOB, 11-19-75, or the search and seizure of items from his home at 914 Santa Lucia Dr., in Pleasant Hill, Ca., 94523, beginning on a date unknown or on or about and between 1/1/09 through 12/31/11 (See CCCNET # TF09-0093 and CCCSCt. # N09-1636) including, CAD logs, and recorded radio communications, investigation or arrest reports, recordings, e mails, photographs, audio and video recordings, affidavits for search warrants, search warrants, destruction orders, request for destruction orders, returns to search warrants, lists of property and currency seized, internal and external evidence chain of custody documents, asset forfeiture documents, drafted by Antioch Police Department, or any law enforcement agency, including Internal Affairs investigation reports, investigation reports by the Contra Costa County District Attorney's Office, Bureau of Narcotics Enforcement reports, or reports by any special agent of the Federal Bureau of Investigation, Federal Drug Enforcement Administration.

45. Any and all documents pertaining the response to a call by any member of CCCNET including Louis Lombardi, Norman Wielsch, or any other CCCNET officer involved in the response to a call for the seizure of currency mailed to the place of business owned by Michael McGuire located at 1425 Parkside Drive, Walnut Creek, CA and seized by Antioch Police Department, CCCNET or any agent acting on behalf of the CCC Sheriff's Department, San Ramon PD or any other agency beginning on a date unknown or on or about or between 1/1/07 through 12/31/08, including CAD logs, and recorded radio communications, investigation or arrest reports, audio and video recordings, e mails, photographs, affidavits for search warrants, search warrants, returns to search warrants, lists of property and currency seized, internal and external evidence chain of custody documents, asset forfeiture documents, drafted by any agent of CCCNET, Antioch Police Department, or any law enforcement agency, including BNE Internal Affairs investigation reports, investigation reports by the Contra Costa County District Attorney's Office, Bureau of Narcotics Enforcement reports, or reports by and special agent of the Federal Bureau of Investigation, and Federal Drug Enforcement Administration.

46. Any and all documents pertaining to any detentions, consensual encounters, arrest, and search or seizure documents pertaining to any and all contacts between the Antioch Police Department and Jennifer Marie Anderson, DOB, 4-5-89, or of the search and seizure of items and her home at 3550 Vancouver Way, Concord, Ca., 94520, beginning on a date unknown or on or about or between 1/1/09 through 12/31/09, drafted by any officer or agent of the Antioch Police Department, or any law enforcement agency, including CAD logs, and recorded radio communications, investigation or arrest reports, recordings, e mails, photographs, video, audio recordings, search warrants, returns to search warrants, lists of property and currency seized, application for destruction orders and destruction orders, internal and external evidence chain of custody documents, asset forfeiture documents, Internal Affairs Bureau investigation reports, investigation reports or

charging decision documents by the Contra Costa County District Attorney's Office, Bureau of Narcotics Enforcement reports, or reports by any special agent of the Federal Bureau of Investigation, or Federal Drug Enforcement Administration.

47. Any and all documents that comprise or are part of the personnel file of the defendants JOSHUA VINCELET, JAMES WISECARVER JR., STEVEN AIELLO, STEVEN BERGERHOUSE, RONALD KRENZ, DANIELLE JOANNIDES, STEPHANIE A. CHALK, and CAPTAIN LEONARD ORMAN, MICHAEL MORTIMER, DESMOND BITTNER, MATTHEW KOCH and any other officer from the Antioch Police Department who was present at either Plaintiffs' place of business known as GROW IT YOURSELF GARDENS, LLC, "LOCATED AT 401-F SUNSET DRIVE, ANTIOCH, CALIFORNIA 94509., or Officers present at 701 Thompsons Dr., Brentwood, Ca., 94513 from 1/1/07 through 12/31/11, officers present at the home of James E. Cooper, DOB, 12-07-69 from 12/01/07 to 12/31/08, officers present at the home of Justin Reis, at 409 Elberta Ct., Brentwood, Ca., 94513 beginning on a date unknown or on or about May 2008, officers present at the home of Charles "Chucky" Michael Ortega DOB, 1-23-86, and Angelita Baldazo-Ortega, DOB, 10-17-88 at 2201 Sycamore Dr. #16, Antioch, Ca., 94509 beginning on a date unknown or on or about or between 1/14/10, officers present at any search and seizure of any property of Paul R. Quintana beginning on a date unknown or on or about or between 1/14/10, officers present at Sergio Ortega Jr, and Renee Beth Earle's home at 286 Pebble Beach Dr., Brentwood, CA beginning on a date unknown or on or about and between 1/1/08 through 12/31/08, and officers present during the search and seizure of any property from Lewis "Randy" Decker beginning on a date unknown or on or about between 3/1/10 through 7/1/10, officers present during the search and seizure of any property from Michael B. Stout (aka - "Tahoe Mike"), DOB, 5-9-80, at 3828 Killdeer Dr., Antioch, Ca. beginning on a date unknown or on or about and between 5/1/06 through 12/31/08, officers present during the search and seizure of any property from Anthony Denner, DOB 5/6/79 beginning on a date unknown or on or about or between 1/1/09 and 12/31/13, officers present during the search of the home of plaintiff Steven Daniel Lee beginning on a date unknown or on or about and between 1-5-10, and Jack Foster at 4162 Tulare Ct., Antioch, Ca. beginning on a date unknown or on or about and between 1-5-10, officers present during the search and seizure of Timothy Scott Murray, DOB 11/7/73, and his home at 801 Gatter Ct., Antioch, CA beginning on a date unknown or on or about or between 1/1/6/through 12/31/06, officers present during the search and seizure of Ralph Junior Howard, DOB, 12-5-41, Mark A. Fernandez, DOB, 5-19-57, Stephanie Lynn Rangel DOB, 4-12-69, and Deborah L. Tierney, DOB, 4-22-53, at 2924 Pear St., Antioch, Ca., 94509 beginning on a date unknown or on or about 1/1/10 through 12/31/10, officers present during the search and seizure of Daniel Leal at 401 Sunset Drive Ste. F, Antioch, Ca. beginning on a date unknown or on or about or between 10/14/09, officers present during the search and seizure of Art Carasis, DOB 12-17-54, and his home at 1400 Noia Ave., Antioch, Ca., 94509 beginning on a date unknown or on or about or between 1/1/05 through 12/31/13, officers present during the search and seizure of Abraham Jesus Hurtado, DOB 7-14-86 and/or Kathy Montoya DOB, 10-17-88, at 2212 Banyon Way, Antioch, CA. on or about

or between 1/1/10 through 12/31/10, officers present during the search and seizure of Jennifer Marie Anderson, DOB, 4-5-89, or of the search and seizure of items and her home at 3550 Vancouver Way, Concord, Ca., 94520, beginning on a date unknown or on or about or between 1/1/09 through 12/31/09, officers present during the search and seizure of Michelle Iniguez and/or Gabriel Iniguez and their home at 57 Chelsea Wy, Pittsburg, CA beginning on a date unknown or on or about or between 1/1/08 through 12/31/08, officers present during the search and seizure of Dominic Rodriguez, DOB, 6-30-76, at both 4612 Oak Meadow Ct., Antioch, CA., and 5154 Fern Ridge Circle 3550, Discovery Bay CA, beginning on a date unknown or on or about or between 1/1/09 through 12/31/10, officers present during the search and seizure of Jerry Fairley, or search and seizure of any of his homes in Brentwood, Ca., or any home rented and or inhabited by Jerry Fairley in any city, beginning on a date unknown or on or about or between 1/1/09 through 12/31/10, officers present during the search and seizure of Angela Butler, officers present during the search and seizure of Rhonda Lynn Dunning and her home, officers present during the search and seizure of Shiloh J. O'Neill, DOB, 11-19-75, the search and seizure of items from his home at 914 Santa Lucia Dr., in Pleasant Hill, CA 94523, beginning on a date unknown or on or about and between 1/1/09 through 12/31/11, the search and seizure of Michael McGuire and his home located at 1425 Parkside Drive, Walnut Creek CA beginning on a date on or about or between 1/1/07 through 12/31/08, and the search and seizure of Angelo G. Vassos, DOB, 4-2-60, beginning on a date unknown or on or about or between 1/1/05 through 12/31/13 :

- a. any and all documents that concern or are relevant to the incident described in the Complaint, including those documents that concern the entry and search of Plaintiffs' residence, or business, or any witnesses or suspects described in paragraph 47 above;
- b. any and all documents pertaining to any investigation into allegations that defendants Wisecarver Jr. and Steven Aiello tampered with security cameras or security camera systems during the freezing and seizure of the "Grow it Yourself"
- c. police internal affairs investigations relating to each incident described in paragraph 47 above;
- d. statements or interviews of witnesses, informants, Plaintiff, and any police officers who had any role or contact with any incident described in the complaint or any incident described in paragraph 47 above;
- e. incident reports not produced in response to requests made above;
- f. dispatch tapes and CAD logs and transcripts of radio messages made concerning the complaint and all reports of such radio messages described in paragraph 47 above.
- g. the disciplinary record, and any other documents in the possession of a defendant that concerns the hiring, training, duties, performance, assignments, and mental and physical condition of said defendant.

48. For the period of January 2007 to the current date all documents and writings including police guidelines, directives, policy statements, procedures, and training materials, in any

form and of any type, concerning police policy, custom or practice regarding:

- a. Discipline of officers generally,
- b. specific discipline for the violation of constitutional rights, including the Fourth Amendment
- c. the procedure for the drafting and execution of search warrants,
- d. the procedure for the "freezing" of any home, business or automobile,
- e. the policy for recording suspect interviews in the field and at the Antioch Police Department,
- f. the training for officers assigned to forfeiture programs, including ongoing training,
- f. the policy for the collection, storage and preservation of evidence seized pursuant to a search warrant, including but not limited to: property suspected to be stolen, computers, evidence retention of firearms and other weapons, and the retention, control, disposal, and/or return of motor vehicles and property suspected to be purchased from the proceeds of drug sales,
- g. the policy for evidence seizure,
- h. the policy for evidence booking, and retention
- i. the policy for evidence documentation at a crime scene
- j. the policy for evidence documentation at the Antioch Police Department by any seizing or transporting officer of the evidence.
- k. the policy for evidence documentation at the Antioch Police Department by any evidence technician or officer or agent at any APD evidence locker or law enforcement storage facility,
- l. APD's manual detailing the statutory grounds for forfeiture and all applicable policies and procedures, including procedures for prompt notice to interestholders, the expeditious release of seized property, where appropriate, and the prompt resolution of claims of innocent ownership,
- m. the policy for evidence seizure, documentation, and processing of any assets seized for asset forfeiture pursuant to Health and Safety Code section 11470 or any APD common law interpretation of asset forfeiture.
- n. the swearing out of criminal complaints,
- o. the procurement of arrest warrants, and/or Ramey warrants,
- p. the procurement of additional arrest warrants, and/or Ramey warrants after notification that charges previously sought have been dismissed by any prosecuting agency,

49. Each Government Tort claim filed with defendant CITY OF ANTIOCH in which either JOSHUA VINCELET, JAMES WISECARVER JR., STEVEN AIELLO, STEVEN BERGERHOUSE, RONALD KRENZ, DANIELLE JOANNIDES, STEPHANIE A. CHALK, CAPTAIN LEONARD ORMAN, MICHAEL MORTIMER, DESMOND BITTNER, MATTHEW KOCH or any other officer from the Antioch Police Department who was present at any location where James E. Cooper's property was seized, APD officers present at the home of Justin Reis, at 409 Elberta Ct., Brentwood, Ca., 94513,

APD officers present at the home of Charles "Chucky" Michael Ortega and Angelita Baldazo-Ortega, at 2201 Sycamore Dr. #16, Antioch, Ca., 94509, APD officers present at any search and seizure of any property of Paul R. Quintana, officers present at Sergio Ortega Jr. and Renee Beth Earle's home at 286 Pebble Beach Dr., Brentwood, CA, and APD officers present during the search and seizure of any property from Lewis "Randy" Decker, APD officers present during the search and seizure of any property from Michael B. Stout (aka - "Tahoe Mike"), at 3828 Killdeer Dr., Antioch, Ca., APD officers present during the seizure of any property from Anthony Denner, DOB 5/6/79, APD officers present during the search of the home of plaintiff Steven Daniel Lee, and Jack Foster at 4162 Tulare Ct., Antioch, officers present during the search and seizure of Timothy Scott Murray, DOB 11/7/73, at 801 Gatter Ct., Antioch, CA, officers present during the search and seizure of Ralph Junior Howard, DOB, 12-5-41, Mark A. Fernandez, DOB, 5-19-57, Stephanie Lynn Rangel DOB, 4-12-69, and Deborah L. Tierney, DOB 4-22-53 at 2924 Pear St., Antioch, Ca., 94509, officers present during the search and seizure of Daniel Leal at 401 Sunset Drive Ste. F, Antioch, Ca., officers present during the search and seizure of Art Carasis, DOB 12-17-54, at his home at 1400 Noia Ave., Antioch, Ca., 94509, officers present during the search and seizure of the home of Abraham Jesus Hurtado, DOB, 7-14-86, and/or 95219, Kathy Montoya, DOB, 10-17-88 at 2212 Banyon Way, Antioch, CA., officers present during the search and seizure of Jennifer Marie Anderson, and her home at 3550 Vancouver Way, Concord, Ca., 94520, officers present during the search and seizure of Michelle Iniguez and/or Gabriel Iniguez and their home at 57 Chelsea Wy, Pittsburg, CA, officers present during the search and seizure of Dominic Rodriguez, DOB, 6-30-76, at both 4612 Oak Meadow Ct., Antioch, CA., and 5154 Fern Ridge Circle 3550, Discovery Bay, CA, officers present during the search and seizure of Jerry Fairley, or search and seizure of any of his homes in Brentwood, Ca., or any home rented and or inhabited by Jerry Fairley in any city, officers present during the search and seizure of Angela Butler, officers present during the search and seizure of Rhonda Lynn Dunning and her home, and officers present during the search and seizure of Shiloh J. O'Neill, DOB, 11-19-75, or the search and seizure of items from his home at 914 Santa Lucia Dr., in Pleasant Hill, CA 94523, officers present during the search and seizure of Michael McGuire and his home located at 1425 Parkside Drive, Walnut Creek CA, officers present during the search and seizure of Angelo G. Vassos, DOB, 4-2-60, or any other claim filed where a warrant was executed or a probation search was conducted wherein a citizen, suspect or witness alleged that a violation of the Fourth Amendment occurred, or that property was taken pursuant to a drug seizure or prostitution arrest. You may limit your responses to this request to claims for violation of any Fourth Amendment right to be free from unreasonable search or seizure, fabricated probable cause, dishonesty, perjury and false arrest and detention, fabrication of police reports, or interference with a lawful business activity, or theft or damage to property.

50. Any and all memoranda or correspondence, including E-mail, about the incident and between superior officers and defendants, JOSHUA VINCELET, JAMES WISECARVER JR., STEVEN AIELLO, STEVEN BERGERHOUSE, RONALD KRENZ, DANIELLE JOANNIDES, STEPHANIE A. CHALK, and CAPTAIN

LEONARD ORMAN, and MICHAEL MORTIMER, DESMOND BITTNER, MATTHEW KOCH, or any other officer from the Antioch Police Department who was present at any location described in paragraph 47 above where a warrant was executed or a probation search was conducted, as well as any officer responsible for the examination, retention, control, disposal, return or damage to any of Plaintiffs' property.

51. Training records of all training received for Defendants JAMES WISECARVER JR., STEVEN AIELLO, STEVEN BERGERHOUSE, RONALD KRENZ, DANIELLE JOANNIDES, STEPHANIE A. CHALK, and CAPTAIN LEONARD ORMAN, JOSHUA VINCELET and MICHAEL MORTIMER, DESMOND BITTNER, MATTHEW KOCH or any other officer from the Antioch Police Department who was present at any location described in paragraph 47 above.

52. Psychiatric-psychological records of defendants, JAMES WISECARVER JR., STEVEN AIELLO, STEVEN BERGERHOUSE, RONALD KRENZ, DANIELLE JOANNIDES, STEPHANIE A. CHALK, and CAPTAIN LEONARD ORMAN, MICHAEL MORTIMER, JOSHUA VINCELET, DESMOND BITTNER, MATTHEW KOCH or any other officer from the Antioch Police Department who was present at any location described in paragraph 47 above.

53. Performance evaluations of defendants JAMES WISECARVER JR., STEVEN AIELLO, STEVEN BERGERHOUSE, RONALD KRENZ, DANIELLE JOANNIDES, STEPHANIE A. CHALK, and CAPTAIN LEONARD ORMAN, JOSHUA VINCELET, and MICHAEL MORTIMER, DESMOND BITTNER, MATTHEW KOCH or any other officer from the Antioch Police Department who was present at any location described in paragraph 47 above.

54. Any and all claims for sick leave and or medical or worker's compensation claims made by Steven Aiello beginning on a date no later than and/or on or about and between 1/1/13 through 12/31/13.

55. Any and all personnel changes in rank, employment, shift, or duty, or assignments for Officers Vincelet, Wisecarver, Aiello, and Mortimer, or any other named defendant from 1/1/10 to 12/31/13.

56. Any and all documents including statistics, dollar amounts, accounting controls and annual financial audits of all deposits and expenditures, or accounting information pertaining to asset forfeiture money received pursuant to Health and Safety Code section et seq. 11469.

57. Any and all APD internal affairs investigation reports into any citizen complaints against Defendant STEVEN AIELLO for alleged perjury pertaining to his testimony against Plaintiff Steven Lee.

58. Any and all APD internal affairs investigation reports including disciplinary action memoranda or FBI reports in the possession of the APD pertaining to APD policies and procedure violations of data base inquiries, and/or illegal APD data base inquiries by Jimmy Wisecarver Jr. including investigations after any FBI interviews regarding Jimmy Wisecarver Jr. and allegations that he accessed DMV data bases and sold DMV information to Christopher Butler.

59. Any and all APD internal affairs investigation reports into any allegations or complaints

against Defendant STEVEN AIELLO for alleged perjury pertaining to his testimony against Plaintiff Steven Lee

60. Any and all APD internal affairs investigation reports or notes relating to Officers Vincelet, Wisecarver, Aiello, and Mortimer, Orman, Bittner and Koch pursuant to any investigation by the FBI pertaining to misconduct against Officers Vincelet, Wisecarver, Aiello, and Mortimer Orman,, Bittner and Koch

61. Any and all discipline imposed on Officers Vincelet, Wisecarver, Aiello, and Mortimer, Orman, Bittner and Koch pursuant to any and all FBI investigations or interviews, including any and all FBI 302's

62. Any and all documents, including witness interviews, notes, photographs, audio and video recordings, FBI form 302 reports, forensic reports, fingerprint and palm print exemplars, investigation or arrest reports, recordings, e-mails, affidavits for search warrants, search warrants, applications for destruction orders, destruction orders, returns to search warrants, lists of property and/or currency seized, asset forfeiture documents, CAD logs, video, and internal and external evidence chain of custody documents of property seized, documents pertaining to charging decisions drafted by Antioch Police Department, or any law enforcement agency in the possession of APD, including Internal Affairs Bureau investigation reports, investigation reports or charging decision documents by the Contra Costa County District Attorney's Office, Bureau of Narcotics Enforcement reports, or reports by any special agent of the Federal Bureau of Investigation, and Federal Drug Enforcement Administration, constituting, referring and related to any complaint by Mr. Ralph Hernandez including but not limited to Abraham Jesus Hurtado, DOB, 7-14-8, whose property was allegedly stolen, including documents constituting, referring and related to any investigation, responsive to any complaint pertaining to theft from Mr. Hurtado, and constituting, referring, and relating to, Norman Wielsch, Louis Lombardi, Christopher Butler, Michael McGary, Joshua Vincelet, Steven Bergerhouse, Ronald Krenz, Danielle Joannides, Stephanie Chalk, Leonard Orman, Michael Mortimer, Steven Aiello, James Wisecarver Jr., Desmond Bittner and Matthew Koch, and any documents constituting, referring and relating to any search and seizure of Mr. Hurtado's home or property by Norman Wielsch, Louis Lombardi, Michael McGary, Joshua Vincelet, Steven Bergerhouse, Ronald Krenz, Danielle Joannides, Stephanie Chalk, Leonard Orman, Michael Mortimer, Steven Aiello, James Wisecarver Jr., Desmond Bittner and Matthew Koch and/or members of the Antioch Police Department, FBI, IRS, BNE, and CCCNET.

63. Any and all documents named in Defendant City of Antioch's Rule 26 initial disclosures.

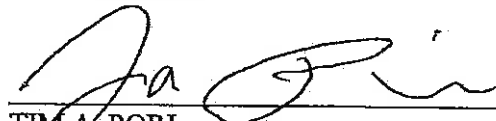
64. Any and all documents from the state Automated Archives System for fingerprint impressions obtained for each officer or agent for employment purposes and from the Automated Fingerprint Identification System for criminal convictions for all Defendants JAMES WISECARVER JR., STEVEN AIELLO, STEVEN BERGERHOUSE, RONALD KRENZ, DANIELLE JOANNIDES, STEPHANIE A. CHALK, and CAPTAIN LEONARD ORMAN, JOSHUA VINCELET and MICHAEL MORTIMER, DESMOND BITTNER, MATTHEW KOCH or any other officer from the Antioch Police Department who was present at any location described in paragraph 47 above.

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3 Dated: May 16 , 2014

Respectfully submitted

4 LAW OFFICES OF TIM A. PORI

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6 By:


TIM A. PORI

7 Attorney for Plaintiffs SEAN O'TOOLE,
8 KELLEY BARBARA O'TOOLE, STEVEN LEE,
9 JENNIFER LYNN CURTIS, and JACK FOSTER
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